Response/Arguments

A.   **Claims In The Case**

Claims 1 – 44 are rejected.   Claims 33 – 44 have been cancelled without prejudice.
Claims 1-32 are pending.

B.   **The Claims Are Not Anticipated By Clapper Pursuant To 35 U.S.C. § 102**

The Examiner rejected claims 1 – 44 pursuant to 35 USC §102(b) as being anticipated by
US Patent No. 5,928,082 granted to Clapper Jr. (Clapper).   Applicant wishes to point out that,
while the Examiner's official rejection of the claims is based on Clapper, the Examiner appears
to make reference to US Patent No. 5,233,513 granted to Doyle, when discussing specific reasons
for claim rejections.   Applicant therefore assumes that the Examiner's rejection based on the
Clapper reference is a typographical error, and that the rejection was intended to be based on the
Doyle reference.   All arguments entered herein are based on the Doyle reference.

A claim is anticipated only if each and every element as set forth in the claim is found,
either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union
Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

Original claim 1 recites:

A method for defining a process map for processing a financial service organization
business product transaction, the method comprising:

displaying a plurality of task objects on a computer display screen;

11

displaying a process map design palette on the computer display screen;

selecting a first task object from the displayed plurality of task objects;

adding the first task object to the process map design palette; and

storing the process map in a business model database;

wherein the process map stored in the business model database is configured for translation into a financial service organization production system database, wherein the financial service organization production system database is configured for use in the financial service organization production system, and wherein the financial service organization production system is configured to process business product transactions between a financial service organization and a financial service organization customer.

The Examiner asserts that Doyle discloses these features. Applicant respectfully disagrees with these rejections.

With regard to the feature of "displaying a plurality of task objects on a computer display screen" the Examiner cites "Figs. 1A-2C and col. 18, lines 120 (sic)." Applicant submits that Figs. 1A-2C appear to depict flow charts of various processes that relate to the software described by Doyle. Applicant submits that neither the cited figures, nor the cited section of Doyle appear to teach or suggest the feature of "displaying a plurality of task objects on a computer display screen." Applicant respectfully requests that the Examiner particularly point out where in the reference this feature is taught or suggested.

With regard to the feature of "displaying a process map design palette on the computer screen" the Examiner cites col. 229, lines 20-55 of Doyle. The cited section of Doyle recites:

The preceding steps and related inputs and outputs are diagramed in FIG. 16, Input screen report layout.
During the performance of the Input screen / report layout steps, input and output data consisting of the following reports, forms and data packets are entered or generated.
40 Screen/Report Standards

41 Screen/Report field Cross Reference
Cross Reference of the fields and the reports they should appear on and if they are input or output update or read only.
42 Screen/Report Design
MetaVision design of application screens and reports that include colors, titles, field edit rules, initial values, etc.
43 Menu Selection
Specified menu selection will bring you to the next action.
44 User Input
Input to the screen by selecting from a pop-up menu or by entering from the keyboard.
45 Screen/Report Fields
Fields from the External Schema that will appear on the screen.
The Create Simple Sentences steps use the RFP's created for the should be model. Simple sentences are written to describe the information on the RFP's They include the following steps:
32111 Retrieve Copies of RFP's
Retrieve RFP's from user interviews and analysis of the "Should Be". These include all Reports, Screens Inputs, etc.
(Doyle, col. 229, lines 20-55)

Applicant submits that the cited section of Doyle appears to teach the collection of data regarding reports using an "Input screen." Applicant submits that the cited section of Doyle, however, does not appear to teach or suggest the feature of "displaying a process map design palette on the computer screen." For example, Applicant's specification teaches:

Figure 19 illustrates one embodiment of a flow designer window that may be displayed on a computer screen to provide an interface to an executing flow designer program as described in the flowcharts of Figure 2b and Figure 2c. In this embodiment, the flow designer window may include a palette 900, a task toolbar 902, and an edit toolbar 904. A palette, as used herein, is a blank portion of a computer display screen on which process maps may be created; for example, a process map may be created by placing icons which represent business objects such as task objects onto a palette, and joining the icons to build an assignment or strategy process flow.
(Specification, pg. 65, line 24 - pg. 66, line 2)

Applicant submits that the cited section of Doyle does not appear to teach or suggest at

least the feature of a display palette. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

With regard to the feature of "selecting a first task object from the displayed plurality of task objects," the Examiner cites col. 7, lines 32-68 and col. 8, lines 1-68 of Doyle. Applicant submits that the cited section of Doyle appears to teach various high level processing steps performed by the described software and users to generate a business model. The cited section does not, however, appear to teach or suggest the cited feature of "selecting a first task object from the displayed plurality of task objects." Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

With regard to the feature of "adding the first task object to the process map design palette," the Examiner cites col. 7, lines 32-68, col. 8, lines 1-68, and col. 93, lines 30-41 of Doyle. Applicant submits that cols. 7 and 8 of Doyle appears to teach various high level processing steps performed by the described software and users to generate a business model. The cited section does not, however, appear to teach or suggest the cited feature of "adding the first task object to the process map design palette." Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

The Examiner further cites a portion of col. 93 of Doyle, which states:

Record icons represent the file structures existing in an enterprise. They consist of rectangles representing fields joined together with other fields in the same record. Each record and field has information entered for it that is integrated with other information from other MetaVision models automatically.
When a Record icon has been placed on a Business Information diagram a series of pop-up dialog windows are displayed with fields for a variety of pieces of information to be input.
To add a Record icon to a Business Information diagram be certain that you have a diagram open for modification either by Opening a previously created one or

14

adding a New one using the corresponding option from the DIAGRAM menu. Move the arrow cursor to the column of icons along the left of the diagram under the menu header CREATE to a location on or near the rectangle and click a mouse button. A cross-hair cursor will replace the arrow cursor. Move the cross-hair cursor using the mouse to a position on the diagram where you wish the Record icon to be centered and click a mouse button again.
(Doyle, col. 93, lines 20-41)

Applicant submits that the cited section of Doyle appears directed to adding a record to a business information diagram. Applicant submits that a record as described by Doyle in the cited section does not appear to have the same features of a task object. For example, Applicant's specification states:

In one embodiment, the business modeler program executing on a computer system may provide a graphical user interface that may allow a user of the program to define business model objects. In one embodiment, the business objects may be represented by icons on a display screen. A business model object may be defined by one or more properties that describe the object and its relationship to other objects. Objects may be created within, or as children of, other objects. An object including a child object may be referred to as a parent of the child object. A child object may inherit properties from its parent object if the parent object is of the same object type as the child object. Objects may also reference other objects effective to access properties of referenced objects. An object may also be able to prevent other objects from referencing the object and from referencing children of the object.

In one embodiment, a method may be provided for displaying and modifying an object's properties on an object property display screen. Types of business model objects may include, but are not limited to, objects that represent organizational units of the FSO, processing tasks to be performed on business product transactions, data elements, collections of data elements in data dictionaries, document templates, business product transaction processing flow maps, credit products such as credit cards, external interfaces, users, queues, and job seats.
(Specification, pg. 7, line 23 - pg. 8, line 11)

Processing task objects may be defined at step 118. Processing tasks are used in assignment maps and strategy maps. Processing tasks perform operations on work packets. Examples of operations that may be performed on work packets

15

include, but are not limited to, adding documents to a work packet, modifying data elements in the documents, performing calculations with data elements, making decisions based upon data elements, invoking external interfaces, sending work packets to queues, and sending work packets to other organizational units. (Specification, pg. 31, line 26 - pg. 32, line 3)

Applicant submits that the claim 1 is directed to the use of task objects for defining a process map for processing a financial service organization business product transaction. Applicant submits that the records described in Doyle do not appear to have the same features of the objects of Applicant's claims. As such, Applicant submits that the cited section of Doyle does not appear to teach or suggest "adding the first task object to the process map design palette." Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested, particularly how the records of Doyle are equivalent to Applicant's task objects.

With regard to the feature of:

the process map stored in the business model database is configured for translation into a financial service organization production system database, wherein the financial service organization production system database is configured for use in the financial service organization production system, and wherein the financial service organization production system is configured to process business product transactions between a financial service organization and a financial service organization customer

the Examiner cites numerous sections of Doyle including col. 1, lines 36-47; col. 3, lines 31-68; col. 4, lines 1-27; col. 7, lines 32-68, col. 8, lines 1-68, and col. 9, lines 1-68.

Applicant's claims are directed to a method of defining a process map for processing a financial service organization business product transaction. The process involves the use of a process map that is stored in a business model database. The process map is then translated into a financial service organization production system database. For example, Applicant's

16

specification states:

> A business object stored in a business model database may have a corresponding business object stored in a production database for use in a production system. The business model database may store business objects in a different format than a production system database stores business objects. A translation program, or production build program, may translate the business objects stored in a business model database into business objects stored in a production database.
> (Specification, pg. 18, lines 7-12)

Applicant submits that the cited sections of Doyle do not appear to teach or suggest the cited feature. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

Applicant submits that the combination of features of claim1 do not appear to be taught or suggested by Doyle. Applicant therefore respectfully requests that the Examiner withdraw the 35 USC §102(b) rejections on these grounds.

Applicant further submits that the features of dependent claims 2-9, in combination with the features of independent claim 1 are not anticipated by Doyle for at least the reasons cited above. Furthermore, many of the dependent claims include features that do not appear to be taught or suggested in Doyle.

For example, claim 5, recites in part "wherein the method further comprises defining a processing path between the first task object and the second task object, wherein the processing path describes a path for business product transactions to be passed from the first processing task to the second processing task in the financial service organization production system." Applicant submits that this feature in combination with the features of independent claim 1 does not appear to be taught of suggested by the cited sections of Doyle. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

17

Claim 6, recites in part "wherein the first task object comprises one or more output links, and wherein defining the processing path between the first task object and the second task object comprises connecting a first output link of the first task object to the second task object." Applicant submits that this feature in combination with the features of independent claim 1 does not appear to be taught of suggested by the cited sections of Doyle. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

Claim 7, recites in part "selecting a third task object from the displayed plurality of task objects; adding the third task object to the process map design palette; and defining a processing path between the first task object and the third task object; wherein the first task object is a decision task object configured to pass a business product transaction to one of the first and second tasks objects as a function of data relating to the financial service organization customer associated with the business product transaction." Applicant submits that this feature in combination with the features of independent claim 1 does not appear to be taught of suggested by the cited sections of Doyle. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

Claim 8, recites in part "wherein the first task is an invoke external interface task" Applicant submits that this feature in combination with the features of independent claim 1 does not appear to be taught of suggested by the cited sections of Doyle. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

Claim 9, recites in part "selecting a third task object from the displayed plurality of task objects; adding the third task object to the process map design palette; and defining a processing

path between the first task object and the third task object; wherein defining the processing path between the first task object and the third task object comprises disconnecting the first output link of the first task object from the second task object and connecting the first output link of the first task object to the third task object." Applicant submits that this feature in combination with the features of independent claim 1 does not appear to be taught of suggested by the cited sections of Doyle. Applicant respectfully requests that the Examiner particularly point out where in Doyle this feature is taught or suggested.

Original claim 10 states:

A system for processing FSO transactions, the system comprising:
    a computer program;
    a computer system;
    wherein the computer program is executable on the computer system to execute the method of:
        displaying a plurality of task objects on a computer display screen;

        displaying a process map design palette on the computer display screen;

        selecting a first task object from the displayed plurality of task objects;

        adding the first task object to the process map design palette; and

        storing the process map in a business model database;

        wherein the process map stored in the business model database is configured for translation into a financial service organization production system database, wherein the financial service organization production system database is configured for use in the financial service organization production system, and wherein the financial service organization production system is configured to process business product transactions between a financial service organization and a financial service organization customer.

Applicant submits that the combination of features of claim10 do not appear to be taught

19

or suggested by Doyle for at least the same reasons cited above. Applicant therefore respectfully requests that the Examiner withdraw the 35 USC §102(b) rejections on these grounds. Applicant further submits that the features of dependent claims 11-22, in combination with the features of independent claim 10 are not anticipated by Doyle for at least the reasons cited above.

Original claim 23 states:

23. (Original) A carrier medium comprising program instructions, wherein the program instructions are executable by a computer system to implement the method of:

displaying a plurality of task objects on a computer display screen;

displaying a process map design palette on the computer display screen;

selecting a first task object from the displayed plurality of task objects;

adding the first task object to the process map design palette; and

storing the process map in a business model database;

wherein the process map stored in the business model database is configured for translation into a financial service organization production system database, wherein the financial service organization production system database is configured for use in the financial service organization production system, and wherein the financial service organization production system is configured to process business product transactions between a financial service organization and a financial service organization customer.

Applicant submits that the combination of features of claim 23 do not appear to be taught or suggested by Doyle for at least the same reasons cited above. Applicant therefore respectfully requests that the Examiner withdraw the 35 USC §102(b) rejections on these grounds. Applicant further submits that the features of dependent claims 24-32, in combination with the features of independent claim 23 are not anticipated by Doyle for at least the reasons cited above.

C.   Summary

In light of the above, Applicant believes the claims to be in immediate condition for allowance. Applicant therefore respectfully requests the removal of all outstanding 35 U.S.C. § 102 rejections. Examiner's favorable consideration of the claims is therefore respectfully solicited.

Applicant respectfully requests a one-month extension of time to respond to the Office Action dated July 31, 2003. A fee authorization form in the amount of $110.00 is enclosed for the extension of time fee. If any further extension of time is required, Applicant hereby requests the appropriate extension of time. If any fees are inadvertently omitted or if any additional fees are required or have been overpaid, please appropriately charge or credit those fees to Meyertons, Hood, Kivlin, Kowert & Goetzel, P.C. Deposit Account Number 50-1505/5053-26401/EBM

Respectfully submitted,

Mark R. DeLuca
Reg. No. 44,649

Patent Agent for Applicant

MEYERTONS, HOOD, KIVLIN, KOWERT & GOETZEL, P.C.
P.O. BOX 398
AUSTIN, TX 78767-0398
(512) 853-8800 (voice)
(512) 853-8801 (facsimile)

Date: December 1, 2003

22